

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

ASHTON, et al.,

Plaintiffs,

v.

AL QAEDA ISLAMIC ARMY, et al.,

Defendants.

BURNETT, et al.,

Plaintiffs,

v.

AL BARAKA INVESTMENT AND
DEVELOPMENT CORP., et al.,

Defendants.

FEDERAL INSURANCE CO., et al.,

Plaintiffs,

v.

AL-QAIDA, et al.,

Defendants.

03 MDL No. 1570 (RCC) • FILE IN

MEMO ENDORSED

02 CV 6977 (RCC)

03 CV 9849 (RCC)

MEMO ENDORSED

03 CV 6978 (RCC)

NOTICE OF MOTION

MEMO ENDORSED

PLEASE TAKE NOTICE that pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, and on the basis of the affidavits attached hereto, and the Good Standing Certificates annexed thereto, the undersigned will move the Court, before the Honorable Richard C. Casey,

M I C R O F I L M
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MAR 16 2004

U.S.D.J., at the United States District Court, Southern District of New York, 500 Pearl Street, New York, NY 10007, at a date and time to be determined by the Court for an order admitting Nancy Luque, Steven A. Maddox, Michael D. McNeely and Donna M. Sheinbach, *pro hac vice*, as counsel for defendants:

(a) African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc., Reston Investments, Inc., Safa Trust, and York Foundation in Case No. 03 CV 9849 (RCC);

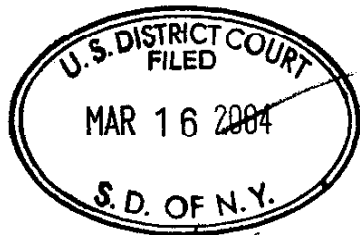
(b) International Institute of Islamic Thought in Case No. 02 CV 6977 (RCC); and

(c) African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc., Reston Investments, Inc., Safa Trust, York Foundation, Sterling Management Group, Inc., Sterling Charitable Gift Fund, Inc., Sanabel Al-Kheer, Inc., Mena Investments, Inc., Sana-bell, Inc., Jamal Barzinji, Iqbal Unus, Muhammad Ashraf, M. Omar Ashraf, Taha Jaber Al-Alwani, and M. Yaqub Mirza in Case No. 03 CV 6978 (RCC).

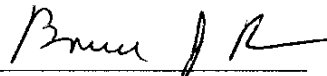
Dated: New York, NY
March 12, 2004

Respectfully submitted,

GRAY CARY WARE & FREIDENRICH LLP



By:


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*Sponsor for Applicants Nancy Luque,
Steven A. Maddox, Michael D. McNeely,
and Donna M. Sheinbach*

Application granted.

Rachael C. ... 3/16/04